

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re REFCO INC. SECURITIES LITIGATION	:	Case No. 07-md-1902 (JSR)
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This Document Relates to:	:	
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KENNETH M. KRYIS, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	Case No. 08-cv-3065 (JSR)
- against -	:	Case No. 08-cv-3086 (JSR)
	:	
CHRISTOPHER SUGRUE, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----X	:	
KENNETH M. KRYIS, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	Case No. 08-cv-7416 (JSR)
	:	
-against-	:	
	:	
ROBERT AARON, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----X	:	
KENNETH M. KRYIS, <i>et al.</i>	:	
	:	
Plaintiffs,	:	Case No. 10-cv-3594 (JSR)
	:	
-against-	:	
	:	
DEUTSCHE BANK SECURITIES INC., <i>et al.</i> ,	:	
	:	
Defendants.	:	
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KENNETH M. KRYIS, <i>et al.</i>	:	
	:	
Plaintiffs,	:	Case No. 11-cv-1486 (JSR)
	:	
-against-	:	
	:	
SCHULTE ROTH & ZABEL LLP,	:	
	:	
Defendant.	:	
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MOTION FOR PRO HAC VICE ADMISSION OF SCOT C. STIRLING

Pursuant to Local Civil Rule 1.3(c), undersigned counsel, a member in good standing of the bar of this Court, respectfully moves for an Order allowing the admission *pro hac vice* of:

Scot C. Stirling
Beus Gilbert PLLC
4800 North Scottsdale Road, Suite 6000
Scottsdale, Arizona 85251
Tel. (480) 429-3000
Fax. (480) 429-3100
Email: sstirling@beusgilbert.com

Mr. Stirling is a member in good standing of the bar of the State of Arizona. There are no pending disciplinary proceedings against Mr. Stirling in state or federal court. This Motion is based on the accompanying affirmation of David Molton and affidavit of Scot C. Stirling and Certificate of Good Standing from the bar of the State of Arizona. A proposed Order is attached hereto.

Dated: New York, New York
January 31, 2012

Respectfully submitted,

By: 

David J. Molton (DM 1106)

Brown Rudnick LLP
Seven Times Square
New York, New York 10036
Telephone: (212) 209-4800
Facsimile: (212) 209-4801
dmolton@brownrudnick.com

Co-Counsel to Plaintiffs

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-against-	:	
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SCHULTE ROTH & ZABEL LLP,	:	
	:	
Defendant.	:	
-----X	:	

**AFFIRMATION OF DAVID MOLTON IN SUPPORT
OF MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE***

DAVID MOLTON declares as follows:

1. I am a partner of Brown Rudnick LLP, Seven Times Square, New York, New York 10036, co-counsel for plaintiffs Kenneth M. Kryz, *et al.* ("Plaintiffs"), in the above-captioned actions.
2. I am a member in good standing of the bar of the State of New York and of the bar of this Court.
3. I make this affirmation in support of the application of Scot C. Stirling, Esq. for admission to the bar of this Court *pro hac vice*.
4. An original affidavit from Mr. Stirling in support of his application for admission to the bar of this Court *pro hac vice* has also been filed with the Court.
5. I will be associated with Mr. Stirling in the prosecution of these matters, and I or another member or associate of Brown Rudnick LLP will file papers, enter appearances, and sign all pleadings, briefs and other papers to be filed with the Court as required by the Rules of this Court.

WHEREFORE it is respectfully requested that the motion to admit Scot C. Stirling, *pro hac vice*, to represent Plaintiffs in the above captioned matters, be granted.

Dated: New York, New York
January 31, 2012

Respectfully submitted,

By: 

David J. Molton (DM 1106)

Brown Rudnick LLP
Seven Times Square
New York, New York 10036

Telephone: (212) 209-4800
Facsimile: (212) 209-4801
dmolton@brownrudnick.com

Co-Counsel to Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Plaintiffs,

- against -

CHRISTOPHER SUGRUE, *et al.*,

Defendants.

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Defendants.

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Defendants.

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KENNETH M. KRYIS, *et al.*

Plaintiffs,

-against-

SCHULTE ROTH & ZABEL LLP,

Defendant.

:
Case No. 11-cv-1486 (JSR)
:

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**AFFIDAVIT OF SCOT C. STIRLING IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

STATE OF ARIZONA)
) ss.:
COUNTY OF MARICOPA)

SCOT C. STIRLING, being duly sworn, deposes and says:

1. I am a partner at the law firm of Beus Gilbert PLLC. I am eligible to practice and am a member in good standing of the bar of the State of Arizona. A Certificate of Good Standing from the bar of the State of Arizona is appended hereto. I have not been suspended or disbarred in any court, and am a member in good standing of every jurisdiction in which I have been admitted to practice.

2. Plaintiffs Kenneth M. Krys, *et al.* ("Plaintiffs"), have requested to be represented by me.

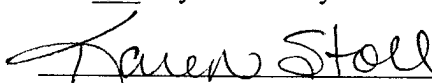
3. I understand that I am charged with knowing and complying with the Rules of this Court, including disciplinary rules, and with paying all required fees.

Based on the foregoing, I respectfully request admission to this Court for the purpose of appearing, arguing, and if necessary, trying the case on behalf of Plaintiffs.



SCOT C. STIRLING

Sworn to before me
this 25th day of January 2012


Notary Public

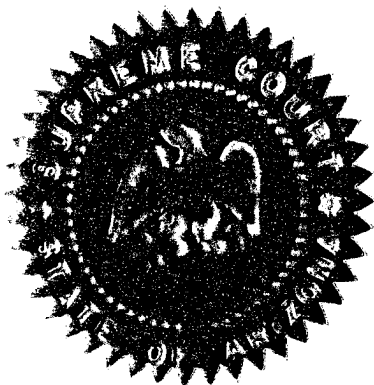


CERTIFICATE OF THE CLERK OF THE SUPREME COURT
OF THE
STATE OF ARIZONA

I, Rachelle M. Resnick, Clerk of the Supreme Court of the State of Arizona, hereby certify that, according to the records of my office and upon the recommendation of the Disciplinary Clerk of the Supreme Court of Arizona

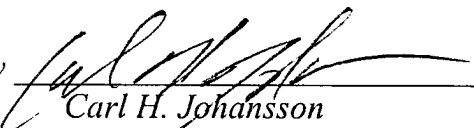
SCOT CHRISTOPHER STIRLING

was on the 28th day of April, 1979 duly admitted to practice as an Attorney and Counselor at Law in all the courts of Arizona; that no disciplinary proceedings are pending against this attorney in the Arizona Supreme Court as of the date of this certificate; and that this name now appears on the Roll of Attorneys in this office as an active member of the Bar in good standing.



Given under my hand and the seal of said Court this 12th day of January, 2012.

RACHELLE M. RESNICK, Clerk

By 
Carl H. Johansson
Deputy Clerk III

CERTIFICATE OF GOOD STANDING
ISSUED BY THE DISCIPLINARY CLERK
FOR AND ON BEHALF OF
THE SUPREME COURT OF ARIZONA

The Disciplinary Clerk pursuant to Rule 74, Rules of the Supreme Court of Arizona, hereby certifies that according to the records of the State Bar, **SCOT CHRISTOPHER STIRLING** was duly admitted to practice as an attorney and counselor at law in all courts of Arizona by the Supreme Court of Arizona on April 28, 1979 and is now, as of the date of this Certificate, an active member of the State Bar of Arizona in good standing.

Given under the seal of the Disciplinary
Clerk of the Supreme Court of Arizona
this January 5, 2012.

A handwritten signature in black ink, appearing to read 'Laura L. Hopkins', written over a horizontal line.

Laura L. Hopkins
Disciplinary Clerk

UNITED STATES DISTRICT COURT
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Defendant.	:	
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ORDER FOR ADMISSION *PRO HAC VICE* OF SCOT C. STIRLING

Upon the motion of plaintiffs Kenneth M. Krys, *et al* ("Plaintiffs"), pursuant to Local Civil Rule 1.3(c), for the admission *pro hac vice* of Scot C. Stirling in the above-captioned matters, the affirmation of David Molton in support thereof and the Affidavit of Scot C. Stirling in support thereof;

IT IS HEREBY ORDERED that

Scot C. Stirling
Beus Gilbert PLLC
4800 North Scottsdale Road, Suite 6000
Scottsdale, Arizona 85251
Tel. (480) 429-3000
Fax. (480) 429-3100
Email: ssirling@beusgilbert.com

is admitted to practice *pro hac vice* as counsel for the Plaintiffs in the above-captioned cases in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If these actions are assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fees to the Clerk of the Court.

Dated: New York, New York
February __, 2012

Special Master Hon. Ronald Hedges

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

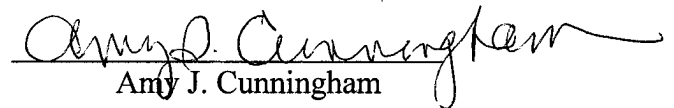
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SCHULTE ROTH & ZABEL LLP,	:	
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AFFIDAVIT OF SERVICE

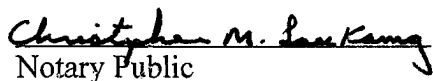
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

1. Amy J. Cunningham, being duly sworn, deposes and says: I am not a party to the within action, am over 18 years of age and am an employee of Brown Rudnick LLP, Seven Times Square, New York, New York 10036.

2. On the 31st day of January, 2012, I caused true and correct copies of (1) Motion for *Pro Hac Vice* Admission of Scot C. Stirling, (2) Affirmation of David Molton in Support of Motion for Admission of Counsel *Pro Hac Vice*, (3) Affidavit of Scot C. Stirling in Support of Motion for Admission *Pro Hac Vice* and (4) [Proposed] Order for Admission *Pro Hac Vice* of Scot C. Stirling, to be served upon all counsel-of-record in the above-captioned matters by email at WHRefcoKrysAll@wilmerhale.com.


Amy J. Cunningham

Sworn to before me this
31st day of January, 2012.


Notary Public

CHRISTOPHER M. LAU KAMG
Notary Public, State of New York
No. 01LA6138897
Qualified in Kings County
Commission Expires December 27, 2013